

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CAPITOL RECORDS, INC. et al.,
 Plaintiffs,
v.
NOOR ALAUJAN,
 Defendant.

Civ. Act. No. 03-cv-11661-NG
(LEAD DOCKET NUMBER)

SONY BMG MUSIC ENTERTAINMENT
et al., Plaintiffs,
v.
JOEL TENENBAUM,
 Defendants.

Civ. Act. No 07-cv-11446-NG
(ORIGINAL DOCKET NUMBER)

Exhibit E to Plaintiffs’ Pretrial Memorandum

PLAINTIFFS’ PROPOSED VERDICT FORM

We the jury, upon our oath, give the following answers to the Court’s questions, based upon a preponderance of the evidence:

A. Plaintiffs’ claim for copyright infringement:

1. On Plaintiffs’ claim for copyright infringement, we find for the:

Answer (Plaintiffs or Defendant): _____

2. If your answer to question 1 is “Plaintiffs,” do you find that Defendant’s infringement was committed willfully?

Answer (Yes or No): _____

3. If your answer to question 1 is "Plaintiffs," what sum of statutory damages do you award Plaintiffs?

Answer (\$750-\$30,000, or \$750-\$150,000 if your answer to question 2 was "Yes"):

_____ x 30 sound recordings = Total \$ _____

SIGN AND DATE THE VERDICT:

SO SAY WE ALL, this _____ day of July, 2009.

(Print Jury Foreperson's Name)

(Jury Foreperson's Signature)

Respectfully submitted this ___th day of July, 2009.

SONY BMG MUSIC ENTERTAINMENT;
WARNER BROS. RECORDS INC.;
ATLANTIC RECORDING CORPORATION;
ARISTA RECORDS LLC; and UMG
RECORDINGS, INC.

By their attorneys,

By: s/ Eve G. Burton

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July __, 2009.

s/ Eve G. Burton